

REMARKS

Claims 1-76 are now pending in the application. Minor amendments have been made to the claims to simply overcome objections to the claims and rejections of the claims under 35 U.S.C. § 101. The amendments to the claims contained herein are of equivalent scope as originally filed and, thus, are not narrowing amendments. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein and the Request for Continued Examination (RCE) filed concurrently herewith.

Applicant would like to thank the Examiner for courtesy extended during the interview on April 21, 2008. An agreement was not reached.

CLAIM OBJECTIONS

Claim 2 stands objected to for informalities. Applicant has amended Claim 2 in accordance with the Examiner's suggestion. It is therefore believed that this objection is hereby overcome. The amendment to Claim 2 is of equivalent scope as originally filed and, thus, is not a narrowing amendment.

REJECTION UNDER 35 U.S.C. § 101

Claims 65 and 75 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. This rejection is respectfully traversed.

Applicant has amended Claims 65 and 75 simply to overcome the rejection to the claims. The amendments to Claims 65 and 75 are of equivalent scope as originally filed and, thus, are not narrowing amendments.

REJECTION UNDER 35 U.S.C. § 103

Claims 1-6, 9, 11-16, 18-26, 29, 31-36, 38-46, 49, 51-56, 58-64, 67, 69-74 and 76 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ambe et al. (U.S. Pat. No. 7,099,317) in view of Doyle et al. (U.S. Pub. No. 2003/0043853). Claims 8, 10, 28, 30, 48, 50, 66, and 68 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ambe, Doyle and Nozaki et al. (U.S. Pat. No. 6,950,431). These rejections are respectfully traversed.

With respect to amended Claim 1, Ambe and Doyle do not show, teach or suggest at least a data-link layer switch controller that requests generation of an entry in a bridge table based on an IP multicast destination address and an IP source address.

As best understood by Applicant, Ambe creates an entry in an IP multicast table, and Doyle creates an entry in an address resolution protocol (ARP) table. **Neither reference generates a bridge table entry based on IP multicast destination address and IP source address.**

Ambe includes a typical IP multicast table that includes IP multicast addresses. Resolution and forwarding of packets of Ambe are conducted through the IP multicast table. **Ambe does not include a bridge table that includes IP multicast destination addresses.** Bridge tables include data that is used by network bridges to connect multiple network segments at the data link layer (layer 2) of the OSI model. In other words, typical bridge tables include MAC address information and **not IP multicast destination address information.** As recognized by the Examiner, Ambe also does not include a controller that requests generation of entries in a table.

According to the Examiner, Doyle includes generating a table entry based on a request. However, **Doyle does not include generating a bridge table entry**. Instead, Doyle is directed to detecting “spoofed” IP source addresses. Doyle therefore includes generating an entry in an ARP table. The ARP table includes router physical addresses and router IP addresses. Paragraphs [0062]-[0063] of Doyle. Nowhere does Doyle show, teach or suggest that the ARP table is used for network bridging or that it includes a bridge table. Further, **the ARP table does not include IP multicast destination addresses**, as does the bridge table of Claim 1.

In contrast, Claim 1 includes a controller that requests generation of an entry in a bridge table based on IP multicast destination addresses and IP source addresses. Claim 1 therefore includes elements not found, shown, taught or suggested by Ambe and Doyle.

It is a longstanding rule that to establish a prima facie case of obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. *In re Royka*, 180 USPQ 143 (CCPA 1974), see MPEP §2143.03. Here, the Examiner fails to provide **any** reference to support a finding that generation of an entry in a bridge table based on said IP multicast destination address and said IP source address is obvious. Furthermore, when evaluating claims for obviousness under 35 U.S.C. §103, all of the limitations must be considered and given weight. *Ex parte Grasselli*, 231 USPQ 393 (Bd. App. 1983), MPEP § 2144.03. Here, it is clear that the Examiner has given little or no consideration of the limitation **and failed to give the limitation any weight**.

Therefore, Claim 1 is allowable for at least these reasons. Claims 21, 41 and 59 are allowable for at least similar reasons as Claim 1. Claims 2-6, 8-16, 18-20, 22-26, 27-36, 38-40, 42-46, 48-56, 58 60-64, 66-74 and 76 ultimately depend from Claims 1, 21, 41 and 59 and are allowable for at least similar reasons.

ALLOWABLE SUBJECT MATTER

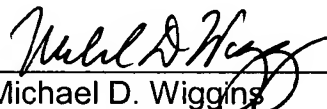
Claims 7, 17, 27, 37, 47 and 57 are allowed.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: April 22, 2008

By: 
Michael D. Wiggins
Reg. No. 34,754

HARNESS, DICKEY & PIERCE, P.L.C.
P.O. Box 828
Bloomfield Hills, Michigan 48303
(248) 641-1600

MDW/JHP/mp